

EXHIBIT D-4

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,
Inc., Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

DECLARATION OF CRAIG MARGOLIS, ESQ.

I, Craig Margolis, Esq., declare and state as follows:

1. I am over the age of 18 and have personal knowledge of the matters herein. I received my law degree in 1995 and am duly admitted and in good standing to practice law in Massachusetts and the District of Columbia and in several federal courts. I am currently inactive in Pennsylvania.

2. I am a partner at Arnold & Porter Kaye Scholer LLP and am lead trial counsel for Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc. (together "Affiliate Defendants") in the above-captioned case. I am also lead trial counsel for AECOM, AECOM Technical Services, Inc., AECOM Recovery, and Emergency

Response Program Management Consultants (together “AECOM”) in another False Claims Act case, *United States ex rel. Romero v. AECOM*, No. 16-cv-15092, currently pending in the Eastern District of Louisiana.

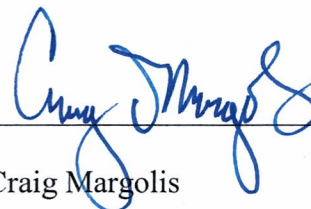
3. The AECOM case is set for trial on October 16, 2023 in New Orleans before Judge Eldon E. Fallon, with the final pretrial conference scheduled for October 3, 2023.

4. Judge Fallon previously extended the schedule in the AECOM case to accommodate (1) the need for additional time to conduct fact and expert discovery, and (2) a serious health issue that arose for the United States’ lead counsel. Both fact and expert discovery have now closed, and the United States’ lead counsel has returned to work.¹ The Court has set aside time on its docket for a multi-week jury trial, and the parties have advised Judge Fallon that that they do not anticipate requesting any additional extensions. AECOM would oppose any further extensions in the case, as the matter has been pending since its unsealing in June 2020.

5. Accordingly, it is my understanding and belief that the trial setting of October 16, 2023 is fixed and not subject to change.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on June 30, 2023 in Washington, DC.


Craig Margolis

¹ By agreement of the parties, a handful of expert depositions are being completed after the June 23, 2023 close of expert discovery, but these will be fully completed by the end of July without any impact on the remaining schedule.